

**STERN KILCULLEN & RUFOLO, LLC**

COUNSELORS AT LAW

HERBERT J. STERN\*  
KEVIN M. KILCULLEN+  
PASQUALE J. RUFOLO  
JOEL M. SILVERSTEIN\*  
MARK W. RUFOLO\*  
MICHAEL DINGER\*  
BRIAN J. DEBOER\*  
JOHN E. TRAVERS^  
LINDA A. ELFENBEIN  
CORINNE M. MAROTTA

325 COLUMBIA TURNPIKE  
SUITE 110, P.O. BOX 992  
FLORHAM PARK, NEW JERSEY 07932-0992  
TEL.: 973-535-1900 • FAX: 973-535-9664

214 BRAZILIAN AVENUE  
SUITE 200  
PALM BEACH, FLORIDA 33480  
TEL.: 561-721-6525

+ADMITTED IN NJ AND FL

\*ADMITTED IN NJ AND NY

^ADMITTED IN NJ, NY, PA AND FL

June 27, 2018

**VIA ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *Chevron Corp. v. Donziger, et al.*, Case No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I respectfully write as co-counsel for Chevron to inquire whether, consistent with Your Honor's practice at the underlying trial of this matter, we may at the June 28, 2018 evidentiary hearing (a) enter into evidence as the direct testimony of Lee Grinberg his March 5, 2018 Declaration (with exhibits) (previously filed herein as Document 1967-2 on March 19, 2018) and (b) have Mr. Grinberg in court that day and available for any cross-examination by Mr. Donziger.

Respectfully,

/s/ Herbert J. Stern

Herbert J. Stern

cc: All Counsel of Record (via ECF)